SEP 15 1972
MICHAEL RODAK, JR., CLERK

In the Supreme Court
OF THE
United States

OCTOBER TERM, 1972

No. 72-134

MRS. BILLIE MCCLURE, *Petitioner*

VS.

THE SALVATION ARMY, *Respondent*

Motion of the National Organization for Women for Leave to File Brief as Amicus Curiae

ON A PETITION FOR A WRIT OF CERTIORARI

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The National Organization for Women moves this court for leave to file a brief in this case as amicus curiae. The consent of the attorney for the petitioner has been obtained, the attorney for respondent has been requested to give consent and has refused to consent to the filing of a brief by the National Organization for Women.

The applicant is the largest national civil rights organization for women in the United States with chapters throughout the country, including Atlanta, Georgia, where the petitioner herein resides. The

applicant's chapter in Atlanta, Georgia has given the petitioner great moral support in this lengthy litigation.

The purposes of the applicant organization are to achieve full equality for women in our society, including, but not limited to, obtaining enforcement of equal employment opportunity under the law. To this end the applicant has, through its officers, testified before Congress in the adoption of the legislation in question, has appeared before Federal and state courts, including this Court, in matters relating to employment discrimination against women.

The issues to be resolved in this case are vital to the purposes and members of the applicant.

The brief of the petitioner herein has raised the issue that there is a substantial constitutional question improperly avoided by the court and issue of constitutionality of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e-1 et seq. However, the discussion of these issues is inadequate and is expanded upon in the brief of the applicant. If the arguments advanced by the applicant are approved by this Court, the decision of the courts below must be reversed.

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